

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IRON MOUNTAIN INCORPORATED;
IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.; C. RICHARD
REESE; JOHN F. KENNY, JR.;
GARRY B. WATZKE; LARRY L. VARN;
and CHARLES G. MOORE,

Plaintiffs and
Counterclaim-Defendants,

v.

THOMAS CARR,

Defendant and
Counterclaim-Plaintiff.

IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.,

Plaintiff,

v.

SYSTRANS FREIGHT SYSTEMS, INC.,

Defendant.

CIVIL ACTION
NO. 05 10890 RCL

CIVIL ACTION
NO. 05 10999 RCL

**IRON MOUNTAIN INFORMATION MANAGEMENT, INC.'S
MOTION FOR SUMMARY JUDGMENT AGAINST
SYSTRANS FREIGHT SYSTEMS, INC.**

Pursuant to Fed. R. Civ. P. 56, Plaintiff Iron Mountain Information Management, Inc. (“IMIM”) hereby moves for summary judgment against Defendant Systrans Freight Systems, Inc. (“Systrans”) and requests that the Court enter summary judgment in favor of IMIM and award IMIM the amount of \$150,000 plus accrued interest.

As more fully set forth in the Declaration of Garry B. Watzke (with exhibits), the Declaration of Kevin M. Colmey (with exhibits) and the supporting memorandum of law, all of which are submitted herewith and incorporated herein by reference, there are no disputed issues of material fact with respect to Systrans's liability to IMIM, and all of the counterclaims asserted by Systrans have been dismissed. IMIM's motion for summary judgment should therefore be granted.

REQUEST FOR ORAL ARGUMENT

IMIM requests oral argument.

Dated: June 21, 2007

**IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.,**

By its attorneys,

/s/ Ira K. Gross
Ira K. Gross (BBO #212720)
igross@sandw.com
Kevin M. Colmey (Admitted *Pro Hac Vice*)
kcolmey@sandw.com
SULLIVAN & WORCESTER LLP
One Post Office Square
Boston, Massachusetts 02109
(617) 338-2800

Certification Pursuant to Local Rule 7.1

Counsel for IMIM hereby certifies that he contacted counsel for Systrans and attempted in good faith to narrow or resolve the issues raised in this motion. Counsel for Systrans would not agree to the relief requested in this motion.

/s/ Kevin M. Colmey

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 21, 2007.

_____/s/ Kevin M. Colmey